



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

November 21, 1985

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Zion Nuclear Power Station Units 1 and 2  
Proposed Amendment to Facility Operating  
License Nos. DPR-39 and DPR-48  
NRC Docket Nos. 50-295 and 50-304

References (a): July 12, 1985 letter from P. C. LeBlond  
to H. R. Denton.

(b): July 26, 1985 letter from P. C. LeBlond  
to H. R. Denton.

(c): August 2, 1985 letter from P. C. LeBlond  
to H. R. Denton.

Dear Mr. Denton:

Reference (a) transmitted a proposed amendment to Facility Operating License Nos. DPR-39 and DPR-48, Appendix A, Section 5.0 - Design Features. This proposed change would raise the enrichment limits to approximately 3.7 w/o for the Spent Fuel Pool and 4.0 w/o for the New Fuel Vault. Reference (b) supplied the license pages that were affected by this proposed amendment.

Subsequent discussions with the NRC indicated that the difference between the 4.0 w/o allowable New Fuel Vault enrichment and the 3.7 w/o Spent Fuel Pool limit was in conflict with the staff's interpretation of the newly issued 10 CFR 53. Commonwealth Edison's rationale for requesting the higher New Fuel Vault limit was simply that the criticality analysis that was performed indicated that 4.0 w/o was acceptable. There is no intent to utilize 4.0 w/o fuel in the Zion units at this time. However, NRC approval of 4.0 w/o fuel for the New Fuel Vault would have facilitated a potential future upgrade to the 4.0 w/o enrichment level for the Spent Fuel Pool.

As a result of these discussions, Commonwealth Edison Company has agreed to restrict the New Fuel Vault's enrichment limit to the 3.7 w/o Spent Fuel Pool limit. Accordingly, a revised set of the affected Technical Specification changes is included in the Attachment. Please use these pages to replace the corresponding pages transmitted with reference (a). The license pages transmitted with reference (b) are not affected.

8512060237 851121  
PDR ADOCK 05000295  
P PDR

A001  
3/37

November 21, 1985

This revision has received on and off-site review and approval. The criticality analysis transmitted by reference (a) and the demonstration of no significant hazards consideration transmitted by reference (c) both remain valid.

As provided by 10 CFR 50.91, the State of Illinois is being notified of this amendment request by a copy of this letter and the attachment.

If there are any further questions regarding this matter, please contact this office.

Three (3) signed originals and thirty-seven (37) copies of this transmittal and its attachments are hereby provided for your review.

Very truly yours,

*Peter LeBlond*

P. C. LeBlond  
Nuclear Licensing Administrator

lm

cc: NRC Resident Inspector - Zion  
J. A. Norris - NRR  
M. C. Parker - State of Illinois

Attachment

SUBSCRIBED AND SWORN to  
before me this 21<sup>st</sup> day  
of November, 1985

*Lelia J. May*  
Notary Public